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Attorney for Debtors

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In Re

RAYMOND AND MARISELDA
ANDERSON,

Debtors.

Bankruptcy Case No. 10-35208

DCN: LDD-1

Chapter 7

MOTION TO COMPEL TRUSTEE TO
ABANDON PROPERTY OF THE ESTATE

DATE: August 3, 2010

TIME: 9:30 am

CTRM: 35

FLOOR: 6th

The Honorable Christopher M. Klein

COMES NOW Debtors to allege as follows:

1. Debtors filed this Chapter 7 Case No. 10-35208 on June 9, 2010. In Schedule D of the original petition the Debtors disclosed that BAC Home Loan Services has a secured interest in the Property of approximately \$460,117.00.

2. On or about June 25, 2010, Debtors filed an Amended Chapter 7 Individual Statement of Intention in which they abandoned their interest in the single family residence located at 10267 Patti Way, Elk Grove, CA.

3. On or about June 28, 2010, Debtors filed an Amended Schedule A disclosing the value of the Property at \$280,000.

3. Debtors believe they have properly exempted all Property of the estate. They are attempting to short sale their Property back to the secured creditor. The secured creditor has

1 accepted an offer on the Property for \$280,000.00 and must close the deal no later than June 30,
2 2010.

3 4. Debtor desires to have properly exempted property abandoned by the Trustee on
4 the basis that administration of such assets is burdensome to the estate and of inconsequential
5 value to the estate. (11 U.S.C. § 554.)
6

7 **WHEREFORE**, Debtor prays:

- 8 1. For an Order Compelling the Trustee to abandon said property of the estate.
9 2. For other relief the Court deems just and proper.

10 Date: June 28, 2010

Respectfully Submitted,

12 LAW OFFICE OF LINDA DEOS

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15 /s/ Linda Deos
16 Linda Deos, Attorney for Debtors,
17 Raymond and Mariselda Anderson
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